

REMARKS

The Office Action dated September 2, 2004 has been received and carefully considered. In this response, claims 1-3, 6-9, 12-15, 23 and 24 have been amended and new claim 25 has been added. The amendments to the claim do not narrow the scope of the claims and support for the amendments and the addition of new claim 25 may be found in the specification and figures as originally filed. Reconsideration of the outstanding objections and rejections in the present application therefore is respectfully requested based on the following remarks.

Objection to Claims 12 and 13

The Applicant notes with appreciation the indication at page 7 of the Office Action that claims 12 and 13 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. The Applicant has added new claim 25 that recites substantially the limitations of claims 1, 7, 12 and 13.

Objection to Claims 23 and 24

At page 2 of the Office Action, claims 23 and 24 were objected to for having incorrect dependencies. Claims 23 and 24 have been amended consistent with the Examiner's remarks. Withdrawal of this objection therefore is respectfully requested.

Obviousness Rejection of Claims 1-11 and 22-24

At page 2 of the Office Action, claims 1-11 and 22-24 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Keith (U.S. Patent No. 5,493,514) in view of Youn (U.S. Patent No. 6,466,623). This rejection is respectfully traversed.

Claim 1, from which claims 2-11 depend, recites, in part, the limitations of accessing a first plurality of macroblock information *in a first order* at a video decoder to generate a first decoded image, *wherein the first order is based upon a first index table* and the first plurality of macroblock information are associated with a source macroblock. The Examiner asserts that Keith discloses these limitations in the passages at col. 42, lines 11-23 and col. 42, line 66 to col. 43, line 15. Specifically, the Examiner asserts that "Keith discloses video decoding the information from the lookup table that stores data pertaining to macroblock data like quantization level and motion vector data *in a certain order*." *Office Action*, p. 2 (emphasis

added). As the cited passages of Keith teach, “[u]nder this decoding method, the current bit location within the encoded bitstream may be represented by a byte pointer and a bit pointer. After each variable-length signal is decoded, the byte and bit pointers are updated according to the number of bits in the signal.” *Keith*, col. 42, lines 19-23. Keith further teaches that the lookup table “maps the possible bit pointer values to the values to be added to the byte pointer. The bit pointer is used as the index to the table . . . Those skilled in the art will understand that the bit/byte pointer update processing of FIG. 32 may also be used to maintain bit and byte pointers for applications, other than Huffman decoding, *in which bit location is tracked in a byte-based processing system.*” *Id.*, col. 42, line 66 to col. 43, line 20 (emphasis added). As the above passages demonstrate, the cited passages of Keith fail to disclose or suggest that the encoded bitstream is accessed in any other order (other than sequential) nor do the cited passages of Keith disclose or suggest that the lookup table determines the order in which data from the bitstream is accessed. Instead, the cited passages of Keith disclose a technique whereby an encoded bitstream having variable length signals may be decoded using bit and byte pointers and a lookup table to determine the size of a variable-length signal in the bitstream. It therefore is respectfully submitted that the Office Action fails to establish that Keith discloses or suggests that the order in which macroblock data is accessed is based on an index table as recited by claim 1. The Office Action does not assert that Youn discloses at least these limitations. Accordingly, the Office Action fails to establish that the proposed combination of Keith and Youn discloses each and every limitation of claim 1, as well as the limitations of claims 2-11 at least by virtue of their dependency from claim 1. Moreover, these claims recite additional limitations neither disclosed nor suggested by the cited references.

Claim 22, from which claims 23 and 24 depend, recites, in part, the limitations of an index table generator coupled to receive a size indicator of a destination image and to generate *an index table identifying a first portion of the plurality of source macroblock information to be used to generate a first destination source vector, the index table based upon the size indicator of the destination image.* The Examiner asserts that Keith discloses these limitations and relies on the above-identified passages and Figure 15 of Keith. However, as noted above, the cited passages of Keith disclose a technique for decoding a bitstream having variable-length signals using bit and byte pointers and a lookup table to determine the size of the variable-length signals. The Applicant respectfully submits that the cited passages of Keith do not disclose the

limitations of generating an index table identifying a first portion of source macroblock information to be used to generate a first destination source vector as recited by claim 22, nor do the cited passages of Keith disclose or suggest the limitations that such an index table is based upon a size indicator of a destination image as also recited by claim 22. The Office Action does not assert that Youn discloses or suggests at least these limitations. Accordingly, the Office Action fails to establish that the proposed combination of Keith and Youn discloses or suggests each and every limitation of claim 22, as well as each and every limitation of claims 23 and 24 at least by virtue of their dependency from claim 22. Moreover, these claims recite additional limitations neither disclosed nor suggested by the cited references.

In view of the foregoing, it is respectfully submitted that the obviousness rejection of claims 1-11 and 22-24 is improper at this time and withdrawal of this rejection therefore is respectfully requested.

Obviousness Rejection of Claims 14-21

At page 6 of the Office Action, claims 14-21 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Keith in view of Chen (U.S. Patent No. 6,259,741). This rejection is respectfully traversed.

Claim 14, from which claims 15-21 depend, recites, in part, the limitations of determining an index table having a plurality of entries, the index table based upon a video source resolution and a video destination resolution, wherein *a location (in memory) of each source macroblock information for each macroblock is referenced by a corresponding entry of the index table*. The Examiner asserts that the above-identified passages of Keith disclose these limitations. However, as noted above, the cited passages of Keith disclose a technique whereby a lookup table (which the Examiner appears to equate to the index table of claim 14) is used to determine the actual length of a variable-length signal in an encoded bitstream. It is respectfully submitted, however, that the cited passages of Keith do not disclose or suggest an index table having entries corresponding to the locations of source macroblock information as recited by claim 14. The Examiner does not assert that Chen discloses these limitations. Accordingly, the Applicant respectfully submits that the Office Action fails to establish that the proposed combination of Keith and Chen discloses or suggests each and every limitation of claim 14, as well as each and every limitation of claims 15-21 at least by virtue of their dependency from

claim 14. Moreover, these claims recite additional limitations neither disclosed nor suggested by the cited references.

In view of the foregoing, it is respectfully submitted that the obviousness rejection of claims 14-21 is improper at this time and withdrawal of this rejection therefore is respectfully requested.

Addition of New Claim 25

Support for the addition of new claim 25 may be found in the specification and figures as originally filed. New claim 25 recites, in part, the limitations of generating a first macroblock based on a first estimated destination vector and a second macroblock based on a second estimated destination vector, wherein the first and second macroblocks are to be displayed simultaneously in real time. As admitted by the Examiner at page 8 of the Office Action, the cited references do not disclose at least these limitations.

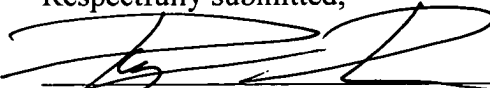
Conclusion

It is respectfully submitted that the present application is in condition for allowance, and an early indication of the same is courteously solicited. The Examiner is respectfully requested to contact the undersigned by telephone at the below listed telephone number in order to expedite resolution of any issues and to expedite passage of the present application to issue, if any comments, questions, or suggestions arise in connection with the present application.

The Commissioner is hereby authorized to charge any fees which may be required, or credit any overpayment, to Deposit Account Number 50-1835.

2 December 2004
Date

Respectfully submitted,



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